



Via E-MAIL Delivery

Robert J. Killeen, Jr.
Killeen & Stern, PC
1811 Bering Drive, Suite 120
Houston, TX 77057

May 26, 2023

Mark F. Kowal
Senior Counsel
Legal Services Division
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MKowal@munichre.com

**RE: Steven Weiss, Post-Employment Legal Obligations to
Roanoke Insurance Group, Inc.**

Dear Mr. Killeen:

I write in reply to your letter of May 24, 2023, claiming that Mr. Weiss cannot accept my uncorroborated assertions that he was employed by Roanoke Insurance Group, Inc. ("Roanoke" or the "Company"), rather than Munich Re America Services, Inc., and that Munich Re America Services, Inc., was a subsidiary of Roanoke Insurance Group, Inc.

Munich Re America Services, Inc.
555 College Road East
Princeton, NJ 08540

Tel.: +1 (609) 243-4200
Fax: +1 (609) 243-4257
www.munichreamerica.com

To be clear, neither I, nor Roanoke ever claimed that Munich Re America Services, Inc. is, or was, a subsidiary of Roanoke Insurance Group, Inc. Furthermore, as I explained previously, Mr. Weiss is employed by Roanoke, and the mere fact that he performed services for Munich Re Specialty Group Insurance Services ("MRSGIS"), does not alter his employment relationship with the Company. *Mr. Weiss, like all other employees that perform services for MRSGIS, is an employee of Roanoke.* To illustrate this point, Mr. Weiss' offer letter unmistakably shows that he was employed by Roanoke, his Employment Agreement unambiguously shows that the Agreement is between him and Roanoke, and his most recent paystub clearly indicates that his employer was Roanoke – the same employer that paid Mr. Weiss during the entirety of the time he provided services to MRSGIS. See Mr. Weiss' most recent paystub attached hereto as Exhibit "A." I trust that this undeniable information satisfies Mr. Weiss' misguided assertion that he was ever an employee of MRSGIS and not Roanoke.

With respect to your other question, I am under no obligation to provide you any additional information regarding my relationship with Roanoke or whether I have binding authority on its behalf. Notwithstanding this, Munich Re America Services, Inc., provides Roanoke with selected legal services, including employment related legal services.

EXHIBIT

A



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Finally, allow this correspondence to reaffirm that the Company does not consent to waive Mr. Weiss' obligations. As I shared in my last letter to you, Mr. Weiss may pursue employment with Arcadian (or any other employer) and start an Ocean and Inland Marine Managing General Agency (or any other endeavor) ***so long as he does not directly, or indirectly, engage in such business activities within the United States for twelve (12) months following his May 24, 2023 termination.***

I can assure you that Roanoke will be monitoring Mr. Weiss' actions very closely for the entirety of the Restricted Period. If Mr. Weiss fails to honor his obligations pursuant to the Agreement, or otherwise, (e.g. engages, either directly or indirectly, in business within the United States, or solicits Company employees, or uses Company confidential, proprietary, or secret information for personal economic gain), then the Company will pursue all measures available to protect its interests – including bringing legal claims against him and Arcadian (or any other employer).

Best regards,

A handwritten signature in black ink, appearing to read "Mark F. Kowal".

Mark F. Kowal

c: Joachim Bucheri (via email w/o encls)

Donald S. Barth, Esq. (via email w/o encls)

EXHIBIT "A"

5/25/23, 7:45 AM

ADP Workforce Now - Pay Profile

Pay Summary: 2023 - 19 - 1

This summary is a record of a payment issued and not an image of the actual pay statement.

| | | | | | |
|--|-----------------------------------|-----------------------|-------------------|--------------------|--------------------------|
| Roanoke Ins Grp Inc 1475 E. Woodfield Road Suite 500 Schaumburg, IL 60173 | Period Beginning Date 5/1/2023 | Pay Date 5/15/2023 | Co. GWW | Clock | Home Dept 066000 |
| Steven Weiss [REDACTED] Weatherford, TX 76087 | Period Ending Date 5/15/2023 | WGPS Advance Pay Date | File # 9999797 | Number 00190278 | Worked In Dept 066000 |

| | |
|-----------------------------|---------------------|
| Gross Pay | \$ 16,645.21 |
| Regular | Rate: 12,514.5000 |
| Auto (field 5) | \$ 12,514.50 |
| Global Pay (field 5) | \$ 250.00 |
| | \$ 3,880.71 |
| Basis of Pay: SALARY | |
| Taxes | \$ 3,348.20 |
| Federal Income Tax | \$ 2,969.15 |
| Medicare | \$ 233.88 |
| Medicare Surtax | \$ 145.17 |
| Deductions | \$ 1,495.41 |
| HSA - HSA | \$ 337.50 |
| IH - HD MED | \$ 158.03 |
| J - SUPP LIFE | \$ 2.50 |
| L - LOAN | \$ 485.70 |
| N - NON QUAL PENSN | \$ 491.86 |
| P - VOL. DENTAL | \$ 14.94 |
| R - VOL. VISION | \$ 4.88 |
| Take Home | \$ 11,801.60 |
| DIRECT DEPOSIT | \$ 11,801.60 |

Other Details**Memos**

| | |
|----------------|-----------|
| Loan | 485.70 |
| Eligible Wages | 12,022.64 |
| ER HSA | 41.66 |